



# Hong Kong's Changing Tax Landscape

Programme Code: SCPD18110801

## About the topic

As an Associate to the Base Erosion and Profit Shifting (BEPS) initiative, Hong Kong is committed to updating its tax legislation to help implement certain BEPS standards. Recent changes introduced by the Inland Revenue (Amendment) (No. 6) Ordinance 2018, which passed in July 2018 (previously the Inland Revenue (Amendment) (No. 6) Bill 2017), will transform the Hong Kong tax landscape. It will demand a materially higher level of taxpayer transparency unseen before, including the cross border sharing of tax information with other authorities. It will focus on substance as the backbone of taxing rights, potentially creating uncertainty regarding the application of the source principles. An inevitable outcome will be a greater compliance burden for taxpayers, a need to reconsider the supportability of existing arrangements, and an increase in tax enquiries as authorities are provided access to new forms of information.

Highlights of this seminar:

- Analysis of major highlights of the Inland Revenue (Amendment) (No. 6) Ordinance 2018
- Reconciling source principles and transfer pricing
- The impact of changing legislation on acceptable tax structures
- The impact of changing legislation on tax controversy landscape

## About the event

<b>Date &amp; Time</b>	8 November 2018, Thursday 7:00 – 8:30 pm
<b>Venue</b>	HKICPA training centre, 27 <sup>th</sup> Floor, Wu Chung House, 213 Queen's Road East, Wanchai
<b>Fee</b>	<ul style="list-style-type: none"> <li>• Taxation Faculty member: HK\$120</li> <li>• HKICPA member or student; and IA/ HKIAAT's member or student: HK\$150</li> <li>• Non-member: HK\$330</li> </ul> <p><i>Not a faculty member? <a href="#">Click here</a> to join.</i></p>
<b>Language</b>	English
<b>HKICPA CPD credit</b>	1.5 hour (subject to actual attendance)
<b>Rating</b>	Advanced level*
<b>Competency</b>	Taxation*
<b>Participant</b>	Tax practitioners and those who wish to know the latest Hong Kong tax development
<b>Objective</b>	Provide tax updates from Hong Kong corporate tax and transfer pricing perspectives
<b>Application deadline</b>	<b>5 November 2018</b>

### Speaker

#### Jo An Yee

Member of Budget Proposal 2019/20 Sub-committee, and Technology, Media & Telecommunications Tax Leader - HK & Macau, EY

#### Martin Richter

Transfer Pricing Leader – HK, EY

### Chair

#### Jo An Yee

Member of Budget Proposal 2019/20 Sub-committee, and Technology, Media & Telecommunications Tax Leader - HK & Macau, EY

\* Please refer [here](#) for descriptions of the various ratings.



## About the speaker

### Jo An Yee

#### Member of Budget Proposal 2019/20 Sub-committee, and Technology, Media & Telecommunications Tax Leader - HK & Macau, EY

Jo An is a Hong Kong tax partner in Ernst & Young (“EY”) specializing in the technology and telecommunication areas and has over 20 years of practical and extensive experience in providing tax advisory and compliance services to top tiered multinational companies. She is currently the Technology, Media & Telecommunications Tax Leader for Hong Kong/Macau and principal key contact for Asia Pacific technology sector - tax.

Jo An has worked on major telecom and technology accounts and has been actively engaged by well-known companies in their fields on their industry-specific tax issues. She has also dealt with senior tax officials from the Inland Revenue Department and contributes to tax related publications and a frequent speaker. She is working in conjunction with Hong Kong Science and Technology Parks Corporation, a statutory body set up by the HKSAR Government, to co-organize a series of tax seminars and is on a mentoring panel to technology start-ups to contribute to the innovation and technology development in Hong Kong, as well as is one of the speakers at the Mobile Game Forum in April 2015.

### Martin Richter

#### Transfer Pricing Leader – HK, EY

Martin is the Partner in charge of EY’s transfer pricing practice in Hong Kong, advising clients in both Hong Kong and Mainland China. Martin is based in Hong Kong and has 18 years of transfer pricing experience, gained from Big 4 practices in London, Washington DC, and Hong Kong.

Martin advises on a full range of different transfer pricing project types, including policy design and implementation, tax aligned restructurings, audit defense, advanced pricing agreements, as well as general compliance and documentation. He has deep experience in advising on a multitude of intercompany transaction types, including establishing and supporting unit prices for tangible goods; fees for services; royalties / licenses / franchises for intangibles; and financing costs for financial transactions.

Martin is also experienced in performing transfer pricing restructuring projects, tax effective business transformation projects, as well as dispute resolution assignments, such as APAs, for multinational companies. These studies have been used to assist clients in evaluating their current inter-company pricing policies for planning and compliance purposes, and also to defend clients against potential inter-company adjustments proposed by tax authorities.

In June 2014 Martin concluded the first ever APA in Hong Kong, which was a bilateral agreement between Hong Kong and the Netherlands. Martin also has experience with integrating tax and transfer pricing principles with supply chain planning and business transformations to achieve operational and tax efficiencies. He has led such multidisciplinary projects in various industries at all stages from feasibility to implementation.

## Registration

- Complete online registration [by 5 November 2018](#).

Contact Betsy Liang at 2287 7009 for enquiry.



To confirm your CPD booking,  
just log on to "My CPA" at  
<http://www.hkicpa.org.hk>

**TAXATION FACULTY EVENT ENROLMENT FORM**

Programme Code: **SCPD18110801**

Finance & Operations Department,  
Hong Kong Institute of CPAs,  
37/F, Wu Chung House, 213 Queen's Road East, Hong Kong

Please click here for online enrolment  
(for HKICPA members only)

Payment & Enrolment Status Enquiry: 2287 7381  
e-mail: [finance@hkicpa.org.hk](mailto:finance@hkicpa.org.hk)  
Fax: 2893 9853

Event Information Enquiry:  
2287 7009 / 2287 7089  
e-mail: [betsyliang@hkicpa.org.hk](mailto:betsyliang@hkicpa.org.hk)

**FOR OFFICE USE**

Seq. no.: \_\_\_\_\_

**Deadline: 5 November 2018**

No.	Membership		Full Name of Participant(s) (Block Letters)	Company	Email address <sup>*(2)</sup> (Block Letters)	Fee		
	No.	Status (1)				Taxation Faculty Member HK\$120	HKICPA member, student /IA/HKIAAT member, student HK\$150	Non- member HK\$330
1								
2								
3								
4								
5								
						Total	HK\$	

\* Email address is for enrolment confirmation purpose. Please refer to note (2) for details.

**Payment Method** (Please tick the appropriate box)

Cheque (no. \_\_\_\_\_) payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA"

VISA / MasterCard       BOC HKICPA UnionPay card

Card Number: \_\_\_\_\_ Card Expiry Date (MM/YY): \_\_\_\_\_

Cardholder's Name (block letters): \_\_\_\_\_ Cardholder's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

I would like to have an official receipt. (Remarks: Official receipt will be sent to your email address provided above.)

- Notes:**
- Membership Status: **TF** = Taxation Faculty member, **NP** = Non-Practising, **P** = Practising, **IA** = International Affiliate, **S** = Student, **HKIAAT** = HKIAAT Student or Member, **GAA** = GAA Passport holder, **NM** = Non-Member.
  - Successful applicants will receive confirmation of registration by email. Unsuccessful applicants will also be notified. If you have not heard from the Institute regarding your registration by **5 November 2018** and if you have other enquiries related to the programme, please make enquiry at 2287 7009.
  - NO ADMISSION TICKET will be issued. Please bring your HKICPA membership card or confirmation email for admission purpose.
  - All applications are on a first-come-first-served basis.
  - Application by fax will ONLY be accepted when payment is made by credit card. Cash is strictly not accepted. Please ensure all the particulars relating to payment are completed, otherwise the application cannot be processed. There is NO need to send in the enrolment form again if it has already been faxed to the Institute.
  - Cheque(s) should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". Please issue SEPARATE CHEQUE for each event.
  - NO REFUND/CANCELLATION will be entertained after the application is processed. If you are unable to attend the enrolled programme, you may nominate a substitute to take your place, provided that the Institute is notified in writing at least two working days prior to the event date.
  - All scheduled events will be cancelled in the event of typhoon signal no. 8 or above or if a Black Rainstorm warning is hoisted. For details of bad weather arrangement for CPD programmes, please refer to the Institute's homepage.
  - The Institute reserves the right to change the venue, date, speaker or to cancel the event due to unforeseen circumstances.
  - Personal Data:** Your personal data collected from the enrolment process and administration of courses will be used for the purpose of the administration of the course on which you are enrolled. Such data collected may be accessible by the Institute's officers, persons or committees processing the application and related matters. In addition, the Institute may use the collected data for statistical research and analysis and, if applicable, for validation of CPD hours. The Institute intends to use the personal data of your name, email address and correspondence address to inform you, where relevant, of CPD activities, members' benefits, goods, services, facilities and events organized or provided by the Institute or other organizations. Members and registered students may opt out of receiving such materials at any time by logging in via the following link <https://www.hkicpa.org.hk/en/members-area/comm-preference/>. Non-members may opt out of receiving such materials at any time by sending an email to the Institute at [privacyofficer@hkicpa.org.hk](mailto:privacyofficer@hkicpa.org.hk) or a letter to the Institute's privacy officer. For more information about the privacy policy of the Institute, please go to <http://www.hkicpa.org.hk/en/service-tools/privacy-policy/>.

For payment by cheque, please fill-in your postal address for refund in case the event is full or cancelled.

Name:	Name:
Address:	Address: